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Attorney for Defendant  
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-cr-00151-WBS-1
	)	
Plaintiff,	)	STIPULATION FOR MODIFICATION OF
	)	CONDITIONS OF PRETRIAL RELEASE;
vs.	)	<del>PROPOSED</del> ORDER
	)	
JOSE CURIEL,	)	Hon. Jeremy D. Peterson
	)	
Defendant.	)	
	)	
	)	

The defendant, JOSE CURIEL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Justin Lee, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Curiel's pretrial release to remove Special Conditions 12 and 13, thereby removing the condition of location monitoring. The requested modification is at the request of Mr. Curiel's pretrial services officer, with which the parties are in agreement.

Mr. Curiel has been on pretrial release in this district since July 2022, on a \$4,000 unsecured appearance bond. *See* Dkt. 18. Mr. Curiel is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Curiel is currently subject to home detention: curfew and must remain inside his residence between the hours of 9:00 p.m. and 6:00 a.m., except for pre-approved employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court ordered obligations; or other activities authorized by the pretrial services officer. Mr. Curiel has

1 been in compliance with all of his conditions of release for the past 18 months, and in light of  
2 such compliance and pretrial services' reduced assessment of flight risk and/or danger in this  
3 case, the parties request that **location monitoring set forth in Special Conditions 12 and 13 be**  
4 **removed.**

5  
6 DATED: December 28, 2023

Respectfully submitted,  
HEATHER E. WILLIAMS  
Federal Defender

8 /s/ Megan T. Hopkins  
9 MEGAN T. HOPKINS  
Assistant Federal Defender  
10 Attorney for JOSE CURIEL

11  
12 DATED: December 28, 2023

PHILLIP A. TALBERT  
United States Attorney

14 /s/ Justin Lee  
15 JUSTIN LEE  
Assistant United States Attorney  
16 Attorney for the United States

**~~PROPOSED~~ ORDER**

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT Special Conditions 12 and 13 shall be removed and Jose Curiel shall no longer be subject to a condition of location monitoring. All other conditions of pretrial release shall remain in force.

DATED: December 29, 2023

  
HON. JEREMY D. PETERSON  
United States Magistrate Judge